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ABSTRACT

As part of the revised method for quality assurance in higher education in England, a Task Group was established to identify the categories of data, information, and judgments about quality and standards of teaching and learning that should be available within higher education institutions (HEIs), and those that should be published. The Task Group published a document in November 2001 (HEFCE-01/66) setting out interim proposals and inviting responses. This report gives the Task Group's final recommendations in light of the consultation responses and wider discussions. The recommendations cover: (1) the main headings for collecting information about quality and standards of learning and teaching; (2) quantitative data to be assembled and published by HEIs; and (3) qualitative information to be published. The report also contains an analysis of the responses to the interim proposals and discussions of changes made to those proposals. Other recommendations are made for the format and method of publication of qualitative information. Also discussed are the steps that must be taken before the revised method for quality assurance can be implemented. Five attachments (annexes) contain detailed information and proposed templates for publishing results and summaries. (SLD)

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Information on quality and standards in higher education

Final report of the Task Group

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Information on quality and standards in higher education

Final report of the Task Group

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Of interest to those responsible for	Quality assurance, Information management
Reference	02/**15**
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Executive summary

Purpose

1. As part of the revised method for quality assurance in higher education in England, a Task Group was set up to identify the categories of data, information and judgements about quality and standards of teaching and learning that should be available within higher education institutions (HEIs), and those which should be published. The Task Group, chaired by Professor Sir Ron Cooke, Vice-Chancellor of the University of York, published a document in November 2001, 'Information on quality and standards of teaching and learning: proposals for consultation' (HEFCE 01/66), setting out interim proposals and inviting responses. This report gives the Task Group's final recommendations in the light of the consultation responses and wider discussions.

Key points

2. The Task Group's recommendations cover:

a. The main headings for collecting information about quality and standards of learning and teaching.

b. The quantitative data to be assembled and published by HEIs.

c. The qualitative information which should be published, including summaries of external examiner reports, outcomes of student satisfaction surveys, summaries of learning and teaching strategies, and outcomes of major programme reviews.

3. This report also includes:

a. An analysis of the responses to the interim proposals made by the Task Group in HEFCE 01/66, contained in Annex B.

b. Discussion of the changes to the interim recommendations which the group has made in the light of responses received.

c. The Task Group's conclusions on a number of outstanding issues which were not covered in HEFCE 01/66.

d. Recommendations on the format and method of publication of qualitative information.

e. Details of further work that will need to be undertaken before implementing the revised method for quality assurance in England.

Introduction and background

4. The joint HEFCE/UUK/SCOP/QAA[1] consultation document 'Quality assurance in higher education' (HEFCE 01/45), published in July 2001, set out proposals for a revised method for quality assurance in higher education in England.

5. The approach built on principles established in discussion with key partners about the operation of future quality assurance arrangements, namely:

a. Meeting public information needs, so that stakeholders – and above all students – can obtain information which is up-to-date, consistent and reliable about the quality and standards of teaching and learning at different HEIs.

b. Recognising the primary responsibility of each HEI to operate robust internal mechanisms for setting, maintaining and reviewing quality and standards; for generating information about its quality and standards; and for publishing the key parts of that information.

c. Lightness of touch, so that the burden on HEIs is reduced to the minimum consistent with proper accountability and meeting information needs, and so that the greatest value is secured from the resources used.

6. The responses to HEFCE 01/45 showed broad support for the proposed model. The analysis of responses is available on the QAA web-site at www.qaa.ac.uk. Notwithstanding that support, HEIs identified a number of areas of concern and issues for further consideration. The two main ones related to the nature of the reviews to be undertaken at subject level within a system based on institutional audit, and the expectations covering public information.

7. The new approach will test the availability within the HEI of information relating to quality and standards of teaching and learning. HEFCE 01/45 announced the setting up of a Task Group, representing the organisations concerned and the users of information, to identify the categories of data, information and judgements that should be available. The Task Group, chaired by Professor Sir Ron Cooke, Vice-Chancellor of the University of York, was asked to review, and prepare a report setting out recommendations on, the following:

a. The information about the quality and standards of teaching and learning which all HEIs should be expected, as a matter of standard good practice, to collect and have available within the institution for the purposes of setting, developing and monitoring quality and standards.

b. Which elements of that information should be published by all HEIs.

c. What definitions should apply to secure consistency between institutions in assembling the information at sub-paragraphs a and b.

d. What formats should apply in publishing the information at sub-paragraph b.

e. The frequency of publication.

8. The Task Group's membership is listed at Annex A. Its interim proposals on the information about quality and standards of teaching and learning which HEIs should collect and have available, and the information which should be published, were set out in consultation paper 01/66 'Information on quality and standards of teaching and learning', published by the HEFCE in November 2001. For ease of reference, these proposals are set out at Annex B, with the responses to the consultation.

9. HEFCE 01/66 was sent to all HEFCE-funded HEIs and further education colleges (FECs), and a range of other interested parties. It was also issued for information to all higher education institutions in Scotland, Wales and Northern Ireland, where separate discussions about quality assessment arrangements are under way. A total of 180 responses were received (including those from Wales, Scotland and Northern Ireland). The consultation process concerned arrangements in England and this report deals with England only. The responses from Wales, Scotland and Northern Ireland have been sent to their respective funding bodies to inform continuing discussions with the QAA and with their HEIs.

[1] The Higher Education Funding Council for England, Universities UK, the Standing Conference of Principals, and the Quality Assurance Agency for Higher Education.

Summary of final recommendations

10. This section sets out the categories of information which the Task Group recommends should be available within HEIs, and those which should be published. It is a revised version of the proposed list in Annex C to HEFCE 01/66, amended to take account of the consultation responses. It summarises the final outcome of the group's work, avoiding the need to refer back to the consultation document.

Information which should be available in all HEIs

11. The group recommends that the following information should be available in all HEIs.

a. Information on the institutional context:

   i. The HEI's mission statement.

   ii. Relevant sections of the HEI's corporate plan.

   iii. Statement of the HEI's quality assurance policies and processes.

   iv. The HEI's learning and teaching strategy and periodic reviews of progress.

b. Information on student admission, progression and completion:

   i. Student qualifications on entry.

   ii. The range of student entrants classified by age, gender, ethnicity, socio-economic background, disability and geographical origin as returned to the Higher Education Statistics Agency (HESA).

   iii. Student progression and retention data for each year of each course/programme, differentiating between failure and withdrawal.

   iv. Data on student completion.

   v. Data on qualifications awarded to students.

   vi. Data on the employment/training outcomes for graduates from the First Destination Survey (FDS).

c. Information on the HEI's internal procedures for assuring academic quality and standards:

   i. Information on programme approval, monitoring and review:

   - programme specifications
   - a statement of the respective roles, responsibilities and authority of different bodies within the HEI involved in programme approval and review
   - key outcomes of programme approval, and annual monitoring and review processes
   - periodic internal reports of major programme reviews
   - reports of periodic internal reviews by the institution of departments or faculties
   - accreditation and monitoring reports by professional, statutory or regulatory bodies.

   ii. Information on assessment procedures and outcomes:

   - assessment strategies, processes and procedures
   - the range and nature of student work
   - external examiners' reports, analysis of their findings, and the actions taken in response
   - reports of periodic reviews of the appropriateness of assessment methods used.

   iii. Information on student satisfaction with their HE experience, covering the views of students on:

   - arrangements for academic and tutorial guidance, support and supervision
   - library services and IT support
   - suitability of accommodation, equipment and facilities for teaching and learning
   - perceptions of the quality of teaching and the range of teaching and learning methods
   - assessment arrangements

- quality of pastoral support.

iv. Information and evidence available to teams undertaking HEIs' own internal reviews of quality and standards in relation to:

- the effectiveness of teaching and learning, in relation to programme aims and curriculum content as they evolve over time
- the range of teaching methods used
- the availability and use of specialist equipment and other resources and materials to support teaching and learning
- staff access to professional development to improve teaching performance, including peer observation and mentoring programmes
- the use of external benchmarking and other comparators both at home and overseas
- the involvement of external peers in the review method, their observations, and the action taken in response.

Information for publication

12. The group recommends that the following information on quality and standards of learning and teaching at each HEI should be published.

a. Quantitative data:

i. HESA data on student entry qualifications (including A-levels, access courses, vocational qualifications, and Scottish Highers).

ii. Performance indicators and benchmarks published by the higher education funding bodies on progression and successful completion for full-time first degree students (separately for progression after the first year, and for all years of the programme).

iii. HESA data on class of first degree, by subject area.

iv. Performance indicators and benchmarks published by the higher education funding bodies on first destinations/employment outcomes for full-time first degree students.

b. Qualitative data:

i. Summaries of external examiners' reports on each programme.

ii. A voluntary commentary by the HEI at whole institution level on the findings of external examiners' reports.

iii. Feedback from recent graduates, disaggregated by institution, collected through a national survey.

iv. Feedback from current students collected through HEIs' own surveys, undertaken on a more consistent basis than now.

v. A summary statement of the institution's learning and teaching strategy as presented to the HEFCE under the Teaching Quality Enhancement Fund programme.

vi. Summary statements of the results of, and the actions taken in response to, periodic programme and departmental reviews, to be undertaken at intervals of not more than six years.

vii. Summaries of the HEI's links with relevant employers, how the institution identifies employer needs and opinions, and how those are used to develop the relevance and richness of learning programmes. These should be included as part of learning and teaching strategies (item v. above) and in individual programme specifications.

Analysis of responses, and changes recommended by the Task Group

13. Annex B contains a full analysis of the responses to the 16 questions posed in HEFCE 01/66. Where the majority of responses agreed with what was proposed, and no fundamental objections were identified on further reflection, the Task Group decided to confirm those proposals. They are included in the group's final recommendations (paragraphs 11 and 12 above) with no further commentary.

14. The responses also raised significant concerns and questions, which were considered further by the Task Group. Its conclusions are set out in the following paragraphs.

Information for publication

15. There was a concern from a significant number of HEIs that the proposals for publication of information appeared more prescriptive than they would wish, and would involve a greater burden. The Task Group takes that concern very seriously.

16. Throughout the Task Group's discussions, the guiding principle has been that the collection, analysis and publication of information should not become a major new burden. Wherever possible, the information should be drawn from existing sources, albeit in some cases with greater standardisation or using those sources to generate new summary information. Wherever possible, the content and format of the published information should be useful for the institution as well as for external stakeholders.

17. In two particular areas, the Task Group has changed its original proposals in order to respond to concerns about burden:

a. It no longer recommends that summaries should be published of institutions' annual programme monitoring reports. The publication requirement would relate only to periodic major reviews of programmes or departments, undertaken at intervals no longer than six years.

b. It no longer recommends that student feedback questions should be added to the FDS, in recognition of the concerns that this would distort the nature of that survey and substantially complicate the work of the staff who administer it.

18. Beyond that, however, the Task Group concluded that its proposals struck a proportionate balance between avoiding unnecessary burdens on HEIs while still securing that sufficient information is published in a consistent, accessible and robust form, to meet the needs of students, employers and other stakeholders. The group recognises that its recommendations will entail some additional work and expenditure. However, the information requirements must not be seen in isolation, but as an integral part of the wider approach to quality assurance. Given the decision to end comprehensive subject review, the overall burden of external quality assurance on HEIs will be substantially reduced, even if the information element is somewhat increased. The Task Group believes that its proposals are thus consistent with the principle of lightness of touch.

19. Much of the information listed in paragraphs 11 and 12 is already available within HEIs, and some of it is already published. So a lot can be achieved by making more systematic use of what is already there.

HEI mission

20. Some respondents were concerned that the publication of standard quantitative information as proposed in HEFCE 01/66 might not take sufficient account of different institutional missions and circumstances. The Task Group was sympathetic to this view. It noted that, given the proposals to make the information available through the Higher Education and Research Opportunities (HERO) web portal in a way which connects with institutions' own web-sites and prospectuses, HEIs will be able to set the published information in context. In particular, there could be a link from the HEI's web-site to the 'institutional profile' for that HEI which is collected and published in standard format by the HEFCE. Additional detail on the proposed method of publication is provided below in paragraphs 56-62.

21. A related concern was that the recommended quantified datasets focus on full-time undergraduate students. This was seen as potentially giving a distorted picture of those institutions with large part-time and postgraduate populations. The reason for the recommendation relates to the calculation of the performance indicator benchmarks. Although a wider range of data exists about part-time and postgraduate students, the benchmarks published by the HEFCE currently focus on full-time undergraduate students. To ensure that differences in institutional mission and circumstances could be taken into account, the group thought it right to concentrate on those quantified indicators for which benchmarks were available.

22. But it will be open to HEIs to supplement the recommended core dataset with their own data on part-time and postgraduate students. Work continues on the HEFCE performance indicators, and the HESA dataset more generally, to broaden the categories of student covered. HEIs will be encouraged to include the wider dataset in the relevant sections of their own web-site if they are concerned that the recommended core data give a misleading impression of their institution.

Subject classification

23. The Task Group considered various possibilities for grouping information at broad subject area level, for those purposes where information was best reported at a level between the individual programme and the whole institution. In HEFCE 01/66 it recommended using the HESA Joint Academic Coding System (JACS) classification of 19 subject areas as striking the best balance.

24. Although that recommendation was supported by 60 per cent of respondents, issues arising from the consultation included:

a. The need to clarify the relationship between the QAA's subject benchmarking categories and the JACS classification (since to date the subject benchmarks have been prepared using the QAA's own 42 subject area classification).

b. The need to ensure that the JACS classification clearly locates all subjects somewhere within its broad subject area groupings.

c. Concerns about the allocation of particular subjects to JACS subject groupings.

25. Hospitality studies, sports science, archaeology, anthropology, geography and psychology were cited in this regard as subjects which did not fit well within the current JACS descriptors.

26. After further consideration of the responses, the Task Group confirmed the recommendation to adopt the JACS classification system. It concluded that it was highly desirable to align with a classification system used for other data collection and publication purposes (the JACS classification is used by both HESA and the Universities and Colleges Admissions Service, UCAS); and that using the 42 QAA subject areas would result in more detail than was necessary. However, further work is needed to address the concerns raised by HEIs about the allocation of particular subjects to JACS subject groupings, particularly to ensure that each subject appears under one heading only. The Task Group has invited HESA to pursue the concerns about attribution of subjects to subject areas as the standard JACS classification system evolves.

Information on assurance of quality and standards

27. The group had proposed that current students should be asked questions about the relevance of their course to further study and prospective employment. Responses showed that institutions were sceptical about this, believing that current students would not be in a position to make that judgement. The Task Group accepts the concern, and has therefore withdrawn this proposal.

External benchmarking and overseas comparators

28. Many respondents sought clarification of the group's suggestion that the information available to teams undertaking internal HEI reviews should include the use of external benchmarking and other comparators at home and overseas (see paragraph 11c sub-paragraph iv). The Task Group believes it is good practice for HEIs to ask themselves how they compare with similar HEIs in the UK and overseas; and that internal review teams should know how that is done within each department, what

information is available, and how it is used. However, the group does not wish to prescribe how benchmarking and overseas comparisons should be undertaken. That is entirely for HEIs to decide.

Summaries of external examiners' reports

29. The group had proposed that summaries of external examiners' reports should be prepared by the examiners themselves, and published as a new form of public information. Full external examiners' reports would continue to be prepared as now, and would remain confidential between the examiner and the HEI.

30. Responses from HEIs showed that the higher education sector is divided on whether summaries should be published. But the proposal has been warmly welcomed by other major stakeholders as a crucial element in making the whole package credible.

31. After further discussion, the Task Group confirmed its recommendation to publish summaries of external examiners' reports, while leaving full external examiner reports confidential as now. It recognised the genuine concerns that requiring the preparation and publication of summaries could affect the existing relationship between HEIs and their examiners, particularly by compromising the openness and frankness of current reporting, and potentially creating an adversarial situation. Overall, however, the group concluded that this rich and comprehensive source of informed independent judgements would provide information of public value, and that summaries of external examiners' reports should therefore be published. In reaching that view, the group welcomed the work separately in hand by Universities UK and SCOP to review the operation of the external examiner mechanism, to see where it might be strengthened and made more consistent.

32. The Task Group discussed at length the format for summaries of external examiner reports. One model which was strongly advocated was to view 'summaries' as being analogous to the audit assurance of external auditors – that is, a basic formulaic statement that certain standard elements had been considered and judged satisfactory. Commentary would only be added where they were judged unsatisfactory. However, as with financial audits, this would probably result in summaries which were identical for the vast majority of programmes, and would do no more than identify the small minority of programmes that fell below acceptable standards.

33. The Task Group therefore decided to propose a template (at Annex C) which requires external examiners to provide succinct commentary for publication, as well as to confirm that standard elements have been considered and judged satisfactory. It will continue to be up to HEIs to agree with their external examiners the content and style of the full reports, which will remain confidential to the institution.

34. The group concluded that the unit for summary reports should be the individual programme. Thus where a single programme of study has two or more external examiners assigned to different modules or sections, there should be a single summary for the programme which combines the conclusions of the respective examiners. Where an HEI appoints a chief external examiner, it would be part of his or her role to bring together reports in that form.

35. Where, however, HEIs offer large modular programmes with multiple pathways, the approach should be to provide summaries for each major module and an overview summary from the chief external examiner. A summary aggregated to the level of the whole modular programme would not give students sufficiently detailed information to be useful. The group recognised that practice can vary substantially between HEIs in how they define modules, programmes and pathways, and that some standard definitions would be needed.

36. The group felt that more should be done to explain to those outside higher education how the external examiner system operates. It did not feel that each external examiner's summary report should comment on the evidence base and methods of working, because there would be so much overlap between reports. But there should be a statement on each HEI's web-site of its overall approach to the appointment and use of external examiners, with a link to individual examiners' summary reports for those wishing to know more.

Using the First Destination Survey to collect the views of recent graduates

37. The group had proposed adding some questions to the existing FDS to ask recent graduates their opinions of the quality and standards of their HE experience. The responses to HEFCE 01/66 confirmed the reaction already received to the HESA consultation on the development of the survey. Around 50 per cent of respondents rejected the proposal to extend the FDS to collect views of recent graduates. The Task Group accepted the concerns expressed that this would distort the nature of the survey and risk compromising current data collection methods. So that proposal has been withdrawn.

38. However, the Task Group confirmed its view that national and institutional surveys of student opinion should be undertaken. Publication of information from student feedback surveys – both a nationally administered survey of recent graduates, and institutionally administered surveys of current students – are essential elements of the overall package. This view is supported by a range of stakeholders. To keep the national survey within manageable limits while ensuring data validity, the group's expectation is that the results would not be disaggregated below the level of the whole institution.

39. A project managed by the HEFCE in collaboration with QAA, SCOP, UUK and the higher education funding bodies for Scotland, Wales and Northern Ireland will review current good practice by HEIs in collecting and using feedback from students on the quality and standards of their programmes. It will also advise on the design and administration of a national survey of recent graduates. The plans for this review are summarised in paragraph 64 below.

Publication of learning and teaching strategies

40. The Task Group had proposed publication of summaries of institutions' learning and teaching strategies. Some respondents said that it was difficult to respond on this issue without knowing the HEFCE's intentions in respect of any future funding programme involving the submission of learning and teaching strategies. Since publication of the consultation paper, the HEFCE Board has decided to continue the Teaching Quality Enhancement Fund, which will include asking institutions to provide updated learning and teaching strategies. Accordingly, the Task Group confirms its recommendation to publish summaries of learning and teaching strategies (see paragraph 12b sub-paragraph v).

Publication of the results of annual programme monitoring and periodic major programme reviews

41. The group had proposed that HEIs should publish summaries of the results of their annual programme monitoring reviews, and of their periodic major reviews. The proposal relating to annual reviews prompted a lot of concern – particularly, that it would represent a major new burden which would add little value. Respondents noted that much of the information which would go into the summary of annual monitoring reviews is proposed for publication elsewhere: for example, data on progression and completion, first degree classification by subject area, summaries of external examiners' reports and institutional responses.

42. The Task Group concluded that the publication of summaries of annual monitoring reviews was unlikely to be productive, for the reasons adduced by respondents. The group therefore recommends publication of summaries only of periodic major programme reviews. This will address one of the significant concerns about extra burden for institutions. Where annual monitoring reviews do throw up significant issues leading to revisions of programme content or method, that should in any case be reflected in updated programme specifications.

43. The group considered what period should be defined for 'periodic' major reviews. It concluded that institutions should have maximum discretion to decide that for themselves, so that reviews could be co-ordinated with relevant activities: for example, with the cycles for accreditation reviews by professional, statutory and regulatory bodies; or the six-year cycle for institutional audits. Overall, the group concluded that major reviews of programmes

and departments should take place at intervals no longer than six years, and less wherever the institution concluded that that gave better alignment with other activities.

Employers' views

44. Respondents sought clarification on whether the Task Group was proposing publication of 'summary material on how the institution identifies employer needs and opinions' or 'summary material on employers' views on recent graduates they have recruited'. The former is the minimum requirement: in all cases, HEIs should summarise in programme specifications and learning and teaching strategies how they identify needs and opinions, and reflect them in the design and delivery of programmes (see paragraph 12b sub-paragraph vii).

45. Where HEIs have information on employers' views on the graduates they have recruited, it would seem helpful to include it. But that would be voluntary. The Task Group recognises that in many cases no such information will exist, nor could it usefully be collected in relation to programmes which do not lead to defined career routes.

46. Most respondents were supportive in principle of a national survey of employers' views, but a sizeable minority felt that these had been conducted in the past with little value accruing to the sector. This ambivalence is consistent with the group's own discussions: that in principle survey information of employers' views would be a good thing to have, but in practice it would be extremely difficult to collect the information in a meaningful or useful way.

47. The Task Group noted the differing views of respondents. Given the other priorities that have to be addressed, overall it concluded that a national survey of employers' views was unlikely to serve a useful purpose at this stage. Once the other elements of information collection and publication have become fully established, it may then be appropriate to revert to the question of collecting employers' views.

Further education colleges

48. The Association of Colleges expressed concern at not having been involved in the group's work. The HEFCE has held separate discussions with the association and a group of college representatives. As a result, a separate statement is being prepared of the HEFCE's overall approach to quality assurance of higher education in FECs.

Other issues, formats for publication, and next steps

49. In the course of its work, the Task Group identified a number of other issues which were not included in HEFCE 01/66, namely:

a. The approach which should be taken to research degrees.

b. Ways in which the recommendations in HEFCE 01/66 relate to collaborative provision.

c. The types of benchmark it would be useful and feasible to produce at subject level.

Research degrees

50. The group felt that appraisal of the institution's approach to teaching and learning in relation to research programmes was an appropriate part of the overall institutional audit process. Research was already covered by the existing institutional review method (although not by subject-level review), and was included in the QAA code of practice. However, that did not imply that research programmes should therefore be covered by the information recommendations within the group's remit. The information relating to the quality and standards of teaching and learning on research programmes would be very different from that required for taught programmes, because of the prevalence of one-to-one supervision of research programmes.

51. The group therefore agreed that research programmes should not be included within its recommendations on information, which should be restricted to taught programmes. In the longer term, information about quality and standards on research programmes might be revisited, particularly given the growing proportion of taught material in many research programmes. Some information about research programmes is already published, such as completion rates for PhDs. Some specialist HEIs have a preponderance of

postgraduate programmes which would need special consideration. But for the present the group decided to focus its recommendations about information exclusively on taught programmes.

Relationship to collaborative provision

52. The QAA code of practice includes a section on collaborative provision. The institutional audit method proposed will therefore cover, through consideration of that part of the code, students on franchised programmes in England (mostly franchises from HEIs to FECs). It was less clear to what extent overseas students would be covered. The Task Group felt that such students should be included where possible in the information about quality and standards. For example, students on overseas-delivered programmes should have external examiners assigned to their programmes, and so the group's recommendations on the use of external examiner reports should apply to them.

53. Overall, the Task Group felt that collaborative provision needed to be addressed in more detail in the final guidance issued by the QAA on the new method.

Performance indicator benchmarks at subject level

54. At present, the HEFCE performance indicators and associated benchmarks are published only at whole institution level. The Task Group believes that HEIs and external audiences would find it valuable if performance indicators and benchmarks could be disaggregated to subject level, using the 19 JACS subject areas.

55. Further work in this area would be undertaken by HESA and the HEFCE's Analytical Services Group and so would not represent a further burden to institutions. The HEFCE/HESA Performance Indicators Steering Group, which had overseen the development of the performance indicators and benchmarks to date, should be asked to consider the feasibility of disaggregation to subject level.

Formats for publication of qualitative information

Templates

56. Many respondents to the consultation paper urged that early consideration should be given to the format in which information would be published, and clarification of what 'published' actually means. The Task Group has considered these aspects. Templates setting out the framework for public reporting are at Annexes C, D and E.

Method of publication

57. The group recognised that publishing and distributing all the information envisaged in printed form would create an unmanageable burden for HEIs, and would not be useful for external audiences. So it concluded that web-based publication should be the norm. The options for web-site publication were discussed with HERO.

58. The information proposed comes from four sources: HESA, higher education funding bodies, individual HEIs and Higher Education Management Statistics (HEMS) reports. If the JACS subject area classification is adopted, it should provide a relatively straightforward data structure that would allow integration of data from the four sources.

59. HERO has advised that it would be reasonable for it to become the web gateway to that information. It would propose to disseminate the information for publication as follows.

60. Each HEI would create a section of its web-site to contain the required information. This would be in two parts, one set up as a secure intranet service for the internal information, the other containing the information for publication. A standard format and template would be agreed. Both sections should be in this format so that if additional information is published there will be no problems of compatibility. Quantitative data should be contained in an MS Excel spreadsheet and qualitative information should be in standard text format. Web addresses (URLs) would be assigned to each set of data and to sub-sets within these. The

following hierarchy might apply: university or college web-site; section of information on quality and standards; dataset; subject area; and subject.

61. HESA, higher education funding bodies and HEMS also hold aggregated datasets for the whole sector. A similar hierarchy could be adopted by them to ensure common presentation of data. Data from these central organisations would be available in two ways: as an aggregated set from the organisation, and as data on an individual HEI presented on that HEI's site.

62. Access to this information could be obtained in two ways:

a. A link from the HERO home page to a new section main page. This would describe the project, the information that is available and how to obtain it. The URL for this page would be the one that is disseminated to publicise the availability of the service. The section main page would contain a search facility to provide the links to data held in HEIs and central organisations. The links would be accessed through a series of pull-down menus.

b. In the profile for each HEI held on HERO, an additional section would be added. This would be a link to the information section on the individual site and a series of links to the dataset level.

Further work

63. Additional work will need to be undertaken if the Task Group's recommendations are to be implemented. The following areas, in particular, will require significant development activity over the next few months.

Student feedback surveys

64. The Task Group has discussed the approach to commissioning advice on the design and implementation of a national survey, and a review of good practice in securing student feedback through HEIs' own internal systems. An invitation to tender has accordingly been issued.

QAA operational description and handbook

65. The QAA is developing its operational description of how the new framework would apply overall; and preparing a handbook for use by reviewers. That will be the route through which the Task Group's recommendations will be implemented, in that each institution's adherence to the information recommendations will be reviewed as part of the new form of institutional audit.

Strengthening the external examiner system

66. Induction training given to external examiners, the content and nature of the reports they are asked to provide, and the form of follow-up by the HEI all vary between HEIs. Practice also varies in respect of the appointment of external examiners. Given the new demands being placed on the external examining system in providing public information, and the central importance of the system in safeguarding standards, greater consistency is needed. Work is now in hand by Universities UK, SCOP and QAA to pursue these issues.

Data issues

67. Work will continue on the development of HEFCE performance indicators and benchmarks and the HESA dataset to embrace wider categories of student such as part-time and postgraduate students.

68. HESA has been invited to consider the concerns raised by HEIs during the consultation about the allocation of particular subjects to the JACS subject groupings.

Publication of information

69. Further discussions will be held with HERO on the best method of publishing the information through the HERO portal.

Annex A

Membership of the Task Group

Professor Sir Ron Cooke – Chair	Vice-Chancellor, University of York; HEFCE Board member
Dr Madeline Atkins	Pro Vice-Chancellor, University of Newcastle
Professor Bob Burgess	Vice-Chancellor, University of Leicester; Chair of HEFCE Quality Assessment Committee
Alexandra Burslem	Vice-Chancellor, Manchester Metropolitan University; Chair of Universities UK Standards and Quality Committee
Carl Gilleard	Chief Executive, Association of Graduate Recruiters
David Holmes	Registrar, University of Oxford
Owain James	National President, National Union of Students
Stephen Marston	Director for Institutions, HEFCE
David Parry	Dean, Academic Quality Service, Southampton Institute
Tim Perry	Director of Academic Services, University College London
Andrew Ramsay	Director for Engineers' Regulation, Engineering Council
Philip Robinson	Director, University College Chichester; Board member of the QAA
Professor Robin Sibson	Chief Executive, HESA

Secretariat

Jim Donaldson	HEFCE consultant
Julie Swan/Peter Williams	QAA
Emma Creasey	HEFCE

Observers

Professor Phil Gummett	Higher Education Funding Council for Wales
Laurence Howells	Scottish Higher Education Funding Council
Gareth Lewis	Higher Education Wales
Sheila Rodgers	Department for Employment and Learning, Northern Ireland
Professor Bill Stevely	Universities Scotland; Principal and Vice-Chancellor of The Robert Gordon University
Greg Wade	SCOP
David Young	Universities UK

Annex B

Analysis of responses to HEFCE 01/66

1. The consultation document asked for responses to be structured to address 16 questions listed in the text. This report follows that structure but in addition gives an overview of the responses from each of the main groups of stakeholders:

- HEIs in England
- FECs in England
- students (the National Union of Students, National Postgraduate Committee and submissions from four individual students' unions, and the National Bureau for Students with Disabilities)
- employers
- staff associations in higher education
- professional statutory and regulatory bodies (PSRBs)
- subject associations
- other bodies and individuals.

Overall picture

2. Most of the responses were from HEIs. A majority accepted in principle the broad thrust of the Task Group's proposals. A percentage breakdown of the responses from HEIs in respect of each proposal is set out below. However, not all institutions expressed a preference or commented on all proposals.

3. Overall, there is good support across the sector for:

a. The principles and purposes of information collection and publication.

b. The Task Group's recommendation that the 19 JACS subject areas should be the classification system used for collection and publication of information.

c. The portfolio concept – a set of defined categories of information within which each HEI collects information to suit its own needs and circumstances.

d. Using four main categories for collecting information about quality and standards.

e. The documents which should be used to describe the institutional context for quality and standards.

f. Data relating to student admission, progression, completion and employment.

g. The information which should be available internally as a basis for institutional audit discussions on assurance of academic quality and standards.

h. The information which should be available to support internal reviews of quality and enhancement of learning opportunities.

4. More reservations were expressed about the information that the Task Group proposed should be published by HEIs. Even though this was a 'sub-set' of the wider set of information, it was generally considered to be more prescriptive. Some respondents considered that it would infringe the institutional autonomy on which the institutional review method, at the heart of the proposed new QAA procedure, is predicated.

5. A smaller number of institutions were in favour of:

a. The proposed quantitative indicators to be included in the published dataset.

b. Publishing summaries of external examiners' reports.

c. The option for HEIs to publish commentaries on external examiners' reports if they wished.

d. Using the FDS to the main HESA record as a vehicle for collecting the views of recent graduates.

e. Dovetailing the publication of learning and teaching strategies with the cycle for institutional audit.

f. Publishing summaries of the results of annual monitoring and periodic major programme reviews at programme level in association with programme specifications.

g. The inclusion of employers' views in HEIs' learning and teaching strategy statements and programme specifications.

6. Several institutions felt that much of what is proposed in terms of public qualitative data will reduce the frankness and transparency of internal development and enhancement processes. Many respondents accepted that the increased focus on internal institutional quality assurance procedures, and the concomitant substantial reduction in external review activity, would inevitably increase expectations about the publication of useful and valid information by HEIs. But they regretted the absence of any acknowledgement of the significant resource implications of collating, publishing and updating the qualitative data proposed.

7. A number of institutions urged the HEFCE to give attention to what 'published' means. Is it intended for information to be available electronically only, or would a paper copy have to be made available on demand? The volume of the published data is likely to be substantial and the need to ensure it is up-to-date will probably mean that electronic publication is the only feasible approach.

8. On an administrative point, some institutions thought it wrong that the HE sector had been given less than a month to respond to proposals considered to be detailed and far reaching.

9. FECs responded in less detail than HEIs. They agreed in large measure with the proposals from the Task Group. Many did comment, however, on the absence of any reference to FECs in the consultation document, and three colleges had difficulty with the proposal to use the JACS classification. Clarification was requested on the appropriateness of learning and teaching strategies in further education in future, and on the role of external verifiers.

10. Student responses were supportive of the Task Group's proposals and urged that consideration be given to student involvement in the new arrangements.

11. Higher education staff welcomed the work that had been done by the Task Group and were largely in agreement with the proposals.

12. Only two responses were received from employers. A summary of those views, together with the views of PSRBs, subject associations and other bodies is given below in paragraphs 75-98.

HEIs in England: responses to questions in the consultation paper

Question 1: Purposes and principles of information collection and publication (paragraphs 18-20 of HEFCE 01/66)

13. Over 90 per cent of respondents agreed with the purposes and principles for collection and publication of information. But many institutions, particularly smaller ones, qualified their agreement and remained concerned that the proposals would not reduce the burden upon institutions, which was a key driver for review of the existing methodology. Attention was drawn to the fact that small changes in datasets can have a profound effect on institutions, and some were not convinced that the purposes and principles could be achieved by the publication of raw data without context. An important principle is that information that usefully informs students and potential students about quality should not be discriminatory as to the mission of the HEI.

Question 2: Disaggregation of information should be based on the 19 JACS subject areas

14. The Task Group's recommendation that the 19 JACS subject areas should be the classification system used for the collection and publication of information was supported by over 60 per cent of respondents. About 15 per cent of respondents thought the 42 subject areas used by the QAA for subject-level review represented the best intermediate classification, while 5 per cent favoured the 24 subject areas covered by the Learning and Teaching Support Network. Other respondents thought that the JACS system had no great advantages over the other systems or did not express an opinion.

15. Some respondents recognised that no classification of subject groups will reflect the pattern of provision in all institutions. Others thought that if the JACS system is to be used then the subject benchmarking categories should be designed in the same way. The preliminary operational description of the new QAA external process refers to a likely shift to a programme focus; this was considered helpful by some institutions. In the view of some, the proposal to use the 19 JACS subject areas highlighted a

mismatch between quantitative and qualitative data. For qualitative data the interest will be at programme level, whereas the quantitative data is an aggregation of provision and was felt to be of limited use either within institutions or to external stakeholders.

16. Although many considered the use of JACS a step in the right direction, a number of institutions cited problems with regard to joint or major/minor courses across subject area boundaries, and uncertainty over modular programmes. Also, it was argued that the system does not cover all subjects, such as hospitality and sports studies.

Question 3: The portfolio concept

17. This question attracted least comment from HEIs. The portfolio concept was supported by over 95 per cent of respondents. Those institutions that commented welcomed the Task Group's view that the exact contents of each section of the portfolio would be for each HEI to decide according to its own internal needs, traditions and practices.

Question 4: There should be four main categories for collecting information about quality and standards

18. Over 90 per cent of respondents agreed with the proposal that four main categories should be used to collect the information on quality and standards. The few institutions disagreeing cited reasons such as: the categories are too prescriptive and restrictive; the quality and enhancement of learning should be disaggregated from learning opportunities; there is a need to make a sharper distinction between quality of provision and academic standards; and there should be more consideration of the interests of students.

Question 5: Are the documents listed the right ones to describe the institutional context for quality and standards?

19. Of respondents, 95 per cent felt the documents listed were the right ones. However, a few believed the list could be extended to include an institution's widening participation strategy, minutes from learning and teaching committees, and an institutional profile. One institution queried whether the list would give sufficient information relating to the wider student experience such as the Student Charter. Some institutions noted that decisions yet to be announced about the future of the HEFCE Teaching Quality Enhancement Fund would affect this item.

Question 6: Are the data the right ones to have available internally in relation to student admission, progression, completion and employment?

20. Approximately 80 per cent of respondents accepted that the right data are listed in relation to admission, progression, completion and employment. Those who disagreed with the proposal commented that the consultation paper was insufficiently clear about whether the data relate to students on all modes of attendance or to full-time students only. Many institutions believed the data requested have a narrow focus on undergraduates, and questioned what information should be used in regard to postgraduate taught provision. They felt that the data requested assumed traditional categories of students.

21. Clarification was sought on whether the data are to be institutionally based, programme-based or based on JACS classifications. About 10 per cent of respondents wished to see data on progression and retention include statistics on transfers between (and within) institutions, while conceding that these statistics are not always reliable or well structured. Some institutions felt that retention and progression rates are skewed by a lack of recognition of intermediate awards. Rates should also take account of students that are intermitting and those who are progressing at a slower rate than anticipated but still in good standing. Transfers in and out are significant and provide a perspective on the flexibility (or otherwise) of student opportunities.

22. With regard to student first destinations, concern was expressed about the two-year follow-up plan. At present, administering the survey six months after graduation can already be problematic, where students have moved and not kept the institution informed.

Question 7: Are the headings listed in paragraph 37 the right ones to use for information on assurance of academic quality and standards?

23. Some 75 per cent of respondents thought that the headings listed were appropriate for assurance of academic quality and standards. The main general concerns expressed, not only by institutions opposed to the proposal but also by those in favour, included the need for clarification on:

a. Whether the information should be available at institutional and/or programme level.

b. The type of 'key outcomes' of programme approval envisaged.

c. The type of information needed to demonstrate the 'range and nature of student work'.

24. A number of respondents made the point that it would be wrong to presume that programme and departmental reviews are always separate activities. Some universities undertake either programme reviews or reviews of departments or conflate the two. Points (d) and (e) in paragraph 37 could therefore be elided. Some cautioned against the list being presented in this format, and suggested it take the form of an examplar dataset, thereby reducing the risk of it being used too prescriptively.

25. A number of institutions felt that asking current students for their views on the relevance of their course to further study and prospective employment was unlikely to elicit informed responses. However, student views should be sought on the organisation and administration of teaching programmes.

Question 8: Are the items listed in paragraph 39 the right ones for HEIs to consider in internal reviews of quality and enhancement of learning opportunities?

26. A substantial majority (75 per cent) of HEIs thought the items listed in paragraph 39 were the right ones. Responses ranged from 'the items listed are entirely appropriate for HEIs to consider in internal reviews' to 'each institution is responsible for maintaining and reviewing its own quality and standards, and external agencies should not be involved in specifying what information should be available to teams undertaking internal reviews... institutional auditors will judge whether an institution's procedures for internal reviews of quality and standards are sufficiently robust'.

27. One institution recommended that information about research and its impact on teaching and learning should also be available for consideration, since this is often considered a key indicator of quality. But it was the reference to external benchmarking that attracted most comment. Institutions sought clarification on what benchmarking was envisaged, whether comparisons with overseas competitors would be compulsory, and on what bases comparisons would be made.

28. One institution noted that peer observation had not previously been indicated as a requirement. Another believed that the headings might usefully include staff involvement in professional body and other peer academic networks that help to establish benchmarks for quality and standards.

Question 9: Are the data in paragraph 42 the appropriate quantitative indicators to include in the published dataset?

29. Some 60 per cent of respondents supported the proposed quantitative indicators. A substantial number of HEIs shared the Task Group's concerns about the use of data on entry qualifications and class of first degree. Many institutions felt that data need to be published alongside the institutional context to enable informed decisions. Respondents had some major reservations about the suggested quantitative data. Many recorded considerable disappointment that the data focus entirely on full-time undergraduate provision and omit any consideration of part-time and postgraduate students. Many remarked that at a time of widening participation it seemed odd to exclude part-time students from the dataset. In some institutions part-time students make up 40 per cent or more of the total student body.

30. Many institutions were disappointed that the issue of 'value added' to students (in terms of progress made in learning since starting the course) had not been addressed. They commented on the need to establish a standard methodology for measuring 'value added' and/or 'distance travelled', and thought that this should be given priority by the HEFCE.

31. A few institutions commented that the consultation document did not mention JACS after the initial proposal to use the classification, and queried whether existing performance indicators at institutional level are to be disaggregated to JACS level.

32. A few respondents raised concerns over the consistency of the HESA data used in compiling the Higher Education Management Statistics. One institution commented that this was the first reference to this dataset being used for formal quality assurance.

Question 10: Do you agree with the Task Group recommendation that summaries of external examiners' reports should be published?

33. This question attracted most comment, and strongest concern, from HEIs. Of those institutions expressing a clear opinion, the responses were split equally for and against. Of those institutions disagreeing with the recommendation, a few institutions preferred to keep all external examiners' reports confidential, but for each course team to prepare a summary for publication; only one favoured publishing all reports in full. Many of the institutions agreeing to the publication of summaries of external examiners' reports did so on the proviso that the core of the summary would be a statement confirming (or otherwise):

- standards of student achievement
- that student performance was comparable to similar programmes at other institutions
- that processes for assessment were sound and had been conducted fairly.

34. Many institutions expressed concern about a process that they judged likely to compromise the external examiner's role and impose an unreasonable workload on the examiners. Some felt that external examiners would cease to be frank in their criticisms if a summary were to be published; and input which might have gone into quality enhancement would instead be diverted into writing a summary report. Summaries, which would be written for a different purpose and readership, would not portray accurately the dialogue between the examiner and the internal bodies responsible for the provision.

35. Many institutions would prefer an approach in which all that is required is an auditing statement as to whether standards are satisfactory and comparable to provision elsewhere. Indeed, some HEIs suggested that a substantial amount of work would be needed before the external examiner system was robust enough to be used for the purposes described in the consultation. Across the sector, there is no common training or induction for external examiners, no agreed methodology by which they undertake their work, no consistent approach towards their duties and responsibilities, and no shared reporting format. The QAA code of practice was seen as a welcome attempt to move HEIs and external examiners towards more consistent and common practices.

Question 11: It should be an option for HEIs to publish commentaries on external examiners' reports if they wish

36. A small majority of respondents agreed with the Task Group's recommendation that it should be an option for HEIs to publish commentaries on external examiners' reports. Many of those supporting the proposal pointed out that they did so only on the basis that some form of summary of external examiners' report would be published. Clearly, if summaries are to be published, then HEIs should have a right of reply.

37. Approximately 40 per cent of respondents were against the proposal. A few institutions supported the other options in paragraph 51 of the consultation paper, the most popular being for each HEI to publish a response at whole institution level, with an overview of themes and responses. Many institutions stated that institutional responses to external examiners' reports were already an integral part of an effective and complete quality assurance system.

Question 12: To use the FDS to collect the views of recent graduates, with HEIs continuing to conduct their own student satisfaction surveys on a more consistent basis

38. This proposal prompted very diverse responses on the best way forward. Few respondents (20 per cent) agreed both strands of the recommendation. Around half of all respondents rejected the proposal to extend the FDS to collect nationally consistent

feedback data on the views of recent graduates about their programmes. Many felt that the proposal to increase the complexity of the FDS would make it more difficult to collect the information and meet the 80 per cent response rate. This is currently achieved through extensive follow-up by telephone. A few institutions, however, had no objection to the extension of the FDS survey.

39. Many institutions thought that conducting their own student satisfaction surveys was the best approach, and that results and action plans arising from the process should then be considered as part of institutional audit. A number of HEIs also supported the idea of requiring institutions to canvass student opinion on a set of core elements, and wished to see further debate and consideration on what those elements should be. Institutions also wished to take account of the most appropriate mechanism to gather students' views, reflecting both their student population and the diversity of programmes on offer. A few institutions remarked that questionnaires are not the only, nor always the most effective, way of obtaining feedback.

40. Only a few institutions supported the introduction of a national student feedback questionnaire.

Question 13: Do you agree with the Task Group recommendation that HEIs should publish learning and teaching strategy statements at the whole institution level?

41. This question attracted little comment and around 80 per cent of respondents supported the recommendation. However, many of those who agreed with the proposal doubted the value of this information to stakeholders.

42. Institutions expressly opposed to the principle of publication (15 per cent) did so either on grounds that many already made available this information on institution web-sites, or that the value of the information to stakeholders was limited. If the information was required they felt it would be more useful at the subject or programme level.

Question 14: Do you agree with the Task Group recommendation that statements of learning and teaching strategies should be published to dovetail with the cycle for institutional audit?

43. Some 60 per cent of respondents supported this recommendation. Most respondents welcomed the proposals with little if any comment, but 30 per cent expressed some concern about the appropriateness of the recommendation. Virtually all of those who opposed it did so on the grounds that the institutional learning and teaching strategy should be prepared to dovetail with the institution's own planning cycle for its corporate strategy. The view was also expressed that there are more critical influences on a university's strategic development (and hence its planning cycle) than the requirement to undergo audit.

44. At present, strategies are developed to dovetail with the funding round and this whole question requires clarification. Another dimension is that, at this stage, institutions have no indication when audit will take place, so timing the development of a learning and teaching strategy to fit in with audit would be difficult.

45. A number of institutions made the point that HEIs should have up-to-date, relevant and comprehensive teaching, learning and assessment strategies which are regularly monitored and updated. Once prepared, they should be used for all purposes and not be a duplication of other requirements.

Question 15: Do you agree with the Task Group recommendation that the results of annual monitoring and periodic major programme reviews should be summarised at programme level in association with programme specifications?

46. This recommendation was supported by only 40 per cent of respondents.

47. Some of those in favour did, nevertheless, have a number of reservations. For example, as with the preparation of summaries of external examiners' reports, this would be a significant annual task for institutions. What goes into the summary will also

be crucial. For example, data on progression and completion are already proposed at institutional level, and first degree classification by subject area. Would this information be included at programme level? Similarly, summaries of external examiners' reports and institutional responses are proposed elsewhere. These items form a major part of monitoring in most institutions yet the information will have been presented elsewhere.

48. Clear guidance about how the reports should be framed, and what they should cover, will be important. A definition of programme will also be required which does not require HEIs offering dual honours programmes to conduct separate processes of monitoring and review for every possible subject combination.

49. Institutions opposed to the recommendation cited a number of reasons why the proposal should not be accepted. Some queried whether the publication of annual monitoring summary reports would meet the usefulness criterion in paragraph 20. It was considered that the objections raised to the publication of external examiner reports were equally valid here. The consequence of requiring publication would be annual review reports that were bland and less than helpful. A few institutions had less difficulty with the recommendation to publish summaries of periodic major programme reviews, although many are not convinced that these reports will provide useful information to potential students. In addition, issues were raised about the currency of the information and the additional burden which producing these summary statements would place on institutions. Some institutions stated they would have no difficulty in making the full texts of all internal review reports available to the institutional auditors. Indeed, they felt that the data should primarily be for internal use as part of the mechanism for ensuring quality and standards and should be verified through the audit process.

50. Some institutions operating modular programmes, where monitoring of provision tends to occur on a subject rather than programme level, thought that implementing this recommendation would necessitate major operational changes. A number of institutions were also wary of integrating annual monitoring summaries and programme specifications. If either monitoring or review leads to the need for changes to a programme, the whole specification should be updated and amended.

Question 16: Do you agree with the Task Group's recommendation that summary material on employers' views should be included both in HEI learning and teaching strategy statements and in programme specifications; and that further consideration should be given to whether a useful national survey could be designed to supplement other forms of information?

51. Of those institutions expressing a clear opinion, a small majority were in favour of including summary material on employers' views both in strategy statements and in programme specifications. Those against were particularly opposed to this information forming part of programme specifications. Some disciplines and programmes lend themselves to employers' views more than others, so there was concern that collection of this information would be more difficult for some areas.

52. A number of institutions commented that employers would be unlikely to sign up to the proposals. A key recommendation from the Task Group would therefore be reliant on a source not obligated to higher education. In those circumstances, it is hard to see how it could achieve useful, reliable, valid or consistent data.

53. A few institutions made the point that their support was on the basis of the inclusion in programme specifications of 'material on how the institution identifies employer needs and opinions' not (as question 16 rephrases it) that 'material on employer views should be included'.

54. Respondents stated that at present the collection of employer views by institutions is conducted through a variety of mechanisms, for example partnership arrangements, accreditation by PSRBs, and feedback on placement students. This information is used by institutions in many ways but primarily for annual course monitoring and evaluation, and the approval of new programmes. Since it forms an important part of annual and periodic review of programmes it should be considered an integral part of institutional audit.

55. A majority of respondents supported further consideration being given to the feasibility of a national survey. But opposition was voiced by a sizeable minority. They took the view that several such surveys had been conducted in the past, including by the DfES and by organisations such as the Council for Industry and Higher Education, and they had generated little that could be harnessed by HEIs.

Collective response

56. One collective response was received – from the Research Intensive Universities Group. This emphasised the importance of each university being entitled to publish a commentary/analysis of its own dataset; expressed concerns about the implications of publishing external examiners' reports; was opposed to extending the FDS to collect data on student satisfaction; and was opposed to publishing the outcomes of annual monitoring and periodic reviews. The group supported the recommendation that HEIs continue to conduct their own surveys of student satisfaction, and welcomed the introduction of a national employer survey.

Further education colleges

57. Fourteen responses were received from FECs. Although FECs responded in much less detail than HEIs there was a substantial measure of agreement with the Task Group's proposals. Two institutions commented that there are no specific references to the ways in which the proposals will translate to directly funded FECs and hence meaningful response was difficult.

58. There was near unanimous agreement from FECs on:

a. The proposals on the purposes and principles for collection and publication of information.

b. Use of the JACS classification system.

c. The portfolio concept, with four main categories for collecting information about quality and standards.

d. The documents listed to describe the institutional context.

e. The data to have available in relation to student admission, progression, completion and employment.

59. Three respondents disagreed with using the JACS classification, and they all thought it important to collect data in the same format as that for subject review. Another respondent commented that FECs have not, as yet, been requested to produce a learning and teaching strategy for submission to the HEFCE as part of the Teaching Quality Enhancement Fund, and questioned its appropriateness in this context.

60. Task Group proposals 7-16 attracted slightly more comment but again met with substantial agreement from respondents. One institution felt that some consideration should be given to 'value added' and benchmarking when deciding the quantitative indicators for inclusion in the published dataset.

61. The role of external verifiers for Edexcel validated course will need to be clarified since, currently, most higher education programmes in FECs are externally examined in a different way.

62. The introduction of a national employer survey was also well received by FECs. It was suggested that this would need to collect views from a large number of small and medium enterprises, as these form the majority of employers, particularly for FECs. Any survey should also embrace HNC/HND programmes.

63. One institution thought that teaching and learning strategies should not only dovetail with the cycle for institutional audit but also with inspections by OfSTED and the Adult Learning Inspectorate.

64. The Association of Colleges – which is the representative body for FECs – expressed disappointment that it had not been invited to work in partnership to develop and implement the proposals. It is concerned that no consideration appears to have been given to ensuring some measure of consistency between the data required of HEIs and of FECs and the nature of judgements being made. The association recommends that urgent attention be paid to ensuring that reviews of higher education in FECs are fully consistent with those in HEIs, to ensure that valid and reliable judgements are made about all HEFCE-funded higher education.

65. While agreeing many of the Task Group's proposals, the association thought that the 19 JACS subject areas would be problematic in relation to vocational subjects and new technology. Where, for example, would hospitality, sports studies, performing arts and digital imaging fit? Statements of student entitlement, clarifying to students what they can expect from the college in terms of standards of service, could usefully be added to the information required on assurance of academic quality and standards. The development of reliable indicators of value added should be a priority.

Students

66. Responses were received from the two main student representative bodies – the National Union of Students (NUS) and the National Postgraduate Committee (NPC) – from three individual students' unions, and from the National Bureau for Students with Disabilities (SKILL).

67. The NUS welcomed the vast bulk of the commentary and recommendations in the consultation paper. It felt that three themes were crucial to the debate about information on quality and standards:

- reliable and comparable information
- effective and comprehensive feedback
- involvement of student representatives and students' unions.

68. Accurate and up-to-date information, down to course level, is considered vital to ensure that potential students and their parents/advisers can make informed decisions. Access to external reports – course by course, subject by subject, and institution by institution – provide the information for comparative choice. There should be greater student involvement in the process. The NUS supported the idea of QAA auditors being in direct dialogue with students' unions prior to formal institutional visits.

69. The NUS had serious concerns as to the 'usefulness' of units below 42 subject levels, and would like information to be available on how often students used the Visitor system, or instigated court proceedings on academic matters, as well as the accessibility of these processes to the student. The importance of the student experience as well as outcomes-related information was also emphasised.

70. The NUS argues strongly for two components in institutional surveys of student satisfaction. The first – a national core component covering topics such as quality of teaching, financial support systems, library and other support provisions – would ensure comparability. The second element would focus on gathering student feedback on areas specific to the institution. A follow-up survey of graduate opinion after a further two years was also supported.

71. The NPC was supportive of the Task Group's proposals. One addition was suggested under purposes and principles: data should be representative, in the sense that they take into account the opinions and evidence of students, staff and examiners as well as HEI management. It raised a concern that many postgraduate students, especially those in HEIs with a small intake, may be reluctant to express dissatisfaction if they feel their comments might not be treated in confidence. Partly for this reason, it argued that all courses should have adequate systems of student representation.

72. The NPC noted that data relating to first degree courses only are being considered for the published set, which could marginalise postgraduate students. It also wishes to see publication of learning and teaching strategies at subject level, and supported the establishment of a national survey of employers' views.

73. Responses from the three individual students' unions were supportive of the Task Group's proposals and broadly in line with the NUS response: a preference for the inclusion of a standard core of questions in a student satisfaction survey; disaggregation at the level of the 42 subject areas; greater involvement in the process by student unions and students; and support for a national survey of employers' views.

74. SKILL noted that there was little reference to disabled students in the consultation paper and urged that information about the quality of provision on offer, particularly the quality of access and support for disabled students, should be among

the information routinely published by HEIs. SKILL also recommended that information on the progression and completion rates of disabled students should be made available.

Employers

75. Two responses – from the Council for Industry and Higher Education (CIHE) and the Hay Group – were received from bodies involved in graduate employment. CIHE broadly welcomed the proposals to gather information from students, graduates, and employers, together with the greater use of external benchmarks. However, it noted the focus on full-time first degree students and argued that a wider perspective should be encouraged.

76. CIHE also welcomed the proposals to provide more information on employers' views, and the aim to show how employers and others are engaged in influencing the curriculum. It urged the HEFCE to go further and to consider how a national survey might collate views on the effectiveness of departments in producing knowledgeable graduates who also have appropriate employability skills.

77. The Hay Group, a management consultancy in leadership and organisational development, suggested that the Transforming Learning system (for collecting and using student feedback for teachers and managers) could meet the need for information on student satisfaction.

Higher education staff

78. Responses were received from the two main unions representing academic and academic-related staff – the National Association of Teachers in Further and Higher Education (NATFHE) and the Association of University Teachers (AUT). Both welcomed the work that had been done by the Task Group and were in agreement with its main proposals.

79. The NATFHE view is that information should be made publicly available to prospective students, and that this should help to establish confidence in the new quality assurance method. The information must allow for realistic comparison to be made between programmes and institutions on terms not wholly determined by institutions themselves. NATFHE also felt it would be helpful to add the institution's widening participation and human resource strategies to documentation describing the institutional context for quality and standards, and that information on socio-economic backgrounds should be part of the published dataset.

80. The AUT felt that the Task Group had managed to strike the right balance between accountability and bureaucracy. It considered it important that any requirement to publish new qualitative data should fit with the Government's 'better regulation' agenda. The AUT wished to see documentation on human resource issues added to that used to describe the institutional context for quality and standards; welcomed the attention devoted to the issue of external examiners and the proposal to publish summaries of their reports; and highlighted the need for appropriate levels of remuneration and workload compensation for external examiners. It was, however, sceptical about the usefulness of a national survey of employers' views.

Professional statutory and regulatory bodies

81. Nine responses were received from the PSRBs. Overall, there was a high level of support for the Task Group's proposals. Two expressed disquiet at the timescale for the consultation.

82. The Bar Council's policy is that there is a case for the retention of subject review; it remains unconvinced that the publication of information coupled with audit will provide it with the assurance of quality it seeks. Against that background, the Bar Council agreed with the vast majority of the Task Group's recommendations other than the publication of learning and teaching strategies at whole institution level. It also thought that published information should be in a form to allow comparisons between courses and programmes offered by different institutions.

83. The General Social Care Council was strongly supportive of the proposals, other than a comment that the classification system should be subject based. It believed that the 19 JACS levels alone would not allow the purposes set out in in the consultation document to be met fully. It would prefer to see the headings used for information on

quality and standards to be extended to include PSRBs; and felt that HEI responses to external examiner reports should be in the public domain.

84. The Council for Professions Supplementary to Medicine (CPSM) was of the view that information specific to the programme/course was essential. If this was not provided in general quality assurance systems then PSRBs would need to devise their own separate procedures to capture it. For example, to date student feedback questionnaires have operated at too general a level for the council's purposes. It also wished to see external examiners retain editorial control of summarised text.

85. The response from the College of Occupational Therapists endorsed the purposes and principles of the paper and restricted comments to two aspects. The first concerns the classification of subject areas: the college prefers the 42 subject areas used by the QAA as this recognises occupational therapy as a discrete subject within the allied health professions. The second refers to an expectation that all information collected, rather than just a sub-set, should be in the public domain.

86. The Hotel and Catering International Management Association supported the proposals but queried the usefulness of classification systems which omitted subject areas such as leisure, sport, tourism and recreation. It also pointed out that many centres take pride in the recruitment and success of non-traditional entrants to higher education, yet this is not reflected in the proposed quantitative indicators for publication.

87. The Royal Society of Chemistry supported the majority of the proposals. However, it strongly disagreed with the proposed use of the 19 JACS subject areas, preferring instead the 42 subject areas used by QAA for subject review. Caution was urged in connection with the design of a national survey of employers' views.

88. The Royal College of Nursing Institute response was supportive of the proposals. Points highlighted for further consideration included the requirement to provide destinations data for all graduates. Many nursing students are part-time and in employment when they enrol and most, on graduation, remain with their current employer. Accreditation of prior (experiential) learning (APL and APEL) are appropriate entry criteria for some students, and the college wished to see this reflected in the data on the student profile.

Subject associations

89. Five responses were received from subject associations or groups speaking on behalf of a subject. Responses were again broadly supportive of the Task Group's recommendations. The points made by one respondent echoed points made earlier by institutions and PSRBs: the short timescale for the consultation; the prescriptive nature of the information which should be available within HEIs in support of quality and standards; and general dissatisfaction with the proposals for the information to be published. Two subject associations said that they would support a classification system, such as the 24 Learning and Teaching Support Network categories or the QAA Standard Subject Units, which separated data on their subject from other subjects.

90. A number of other points were made: the importance of avoiding additional burdens on institutions; the role of external accreditation by the relevant professional body in providing a quality 'kitemark'; and the need for more narrative information for prospective students, parents and employers.

Other bodies

91. Responses were received from a range of other bodies. Some of the key points made are summarised below.

92. The UK Council for Graduate Education commented on the lack of specific reference in the proposals to postgraduate provision or students, and particularly research degrees. Proposals have been framed predominantly in terms of undergraduate provision, and the council questioned the extent to which they have been tested against the more diverse characteristics of postgraduate provision.

93. The Department of Health thought the document was thorough and addressed the needs of different stakeholders. It supported the proposals, and agreed that the JACS coding system would be

acceptable, but requested that the coding be extended to be of greater value in the healthcare field. The department felt that the items listed for HEIs to consider in internal reviews could usefully include references to professional development; and that employers' views should receive greater prominence in HEI feedback than has hitherto been the case.

94. The Institute of Career Guidance agreed with all the Task Group's proposals. It thought that reasons for students withdrawing from their courses might usefully be added to the data to be available in HEIs. It also suggested that the information for assurance of academic quality and standards should include a reference to support from the HE Careers Service.

95. The Society for College, National and University Libraries (SCONUL) and the Universities and Colleges Information Systems Association submitted a joint response. Although registering a concern that the proposals in total may be cumbersome to administer, those emphasising self-evaluation and student satisfaction surveys were particularly welcomed. They also took the view that library and IT services should be added to the items considered as part of the process of internal review of quality. Both organisations would like to contribute to developments relating to library and IT provision.

96. The M25 Consortium of Higher Education Libraries observed that the proposals would represent a significant increase in the administrative burden for institutions.

97. The Church of England Board of Education suggested that 'opportunities for self-development and citizenship education' should be added to the list of items used to gauge student satisfaction levels.

98. The Royal National Institute for the Blind was highly supportive of the Task Group's proposals. It suggested that data collected should serve the whole community so that the needs of disabled students are properly met; and that 'value-added' measures should be developed.

Individuals

99. One individual response was received. This argued for a more collegial, less adversarial approach to quality assurance, in which enhancement is more important than assurance. The respondent felt that serious consideration should be given to QAA visits being on a consultancy and not an assessment basis.

Annex C

Proposed template for publishing summaries of external examiners' reports

1. Name of university/college.

2. Award/award elements examined and UCAS reference.

3. Name of external examiner.

4. External examiner's home university/college or other professional/institutional affiliation.

5. Year in which the external examiner was appointed.

6. Extent to which the institution's processes for assessment, examination and the determination of awards are sound and fairly conducted.

   This would be a confirmatory statement that, from the evidence available to the examiner, the institution's processes for assessment, examination and the determination of awards are sound and fairly conducted; or if not, a statement of the respects in which they fall short.

7. Extent to which the standards set are appropriate for the awards, or award elements, by reference to published national subject benchmarks, the national qualifications framework and institutional programme specifications.

   This would be a confirmatory statement that, from the evidence available to the examiner, the standards set are appropriate; or if not, a statement of the respects in which they fall short.

8. Extent to which the standards of student performance in programmes or parts of programmes examined are comparable with the standards of similar programmes or parts of programmes in other UK higher education institutions with which the examiner is familiar.

   This would be a confirmatory statement that, from the evidence available to the examiner, the standards set are comparable with those applying at other HEIs with which he/she is familiar; or if not, a statement of the respects in which they fall short.

9. Overview and comments/recommendations.

   This would be a paragraph of around 200-300 words giving the examiner's overview of key characteristics of the programme which he/she considers sufficiently significant in relation to present or future standards to be worth drawing to the attention of external audiences. The paragraph would identify distinctive or innovative programme elements and notable strengths; and aspects which should be strengthened or risks which should be addressed in order to maintain confidence in standards on that programme.

Annex D

Proposed template for publishing results of student feedback from HEIs' own institutional surveys

(This format is the Task Group's provisional view. Final decisions will be taken in the light of the conclusions of the separate project to review good practice in student feedback surveys.)

1. Institution.

2. Programme.

3. Academic year and level of programme.

4. Response rate from the students on that programme, expressed as number and percentage responding to the survey.

5. Quantified survey results (in terms of percentage of respondents expressing satisfaction) on:

a. Academic and tutorial guidance, support and supervision.

b. Quality of teaching.

c. Range and appropriateness of learning and teaching methods.

d. Usefulness and promptness of feedback on assessments.

e. Quality of learning resources (individual HEIs could, if they wished, disaggregate this question between library services and IT support).

f. Suitability of accommodation, equipment and facilities for learning and teaching.

g. Quality of pastoral support.

6. Brief comment by the institution (selectively and in aggregate, not necessarily on each point of section 5 separately) on:

a. Any textual comments from the survey results which help to interpret the quantified results in section 5.

b. Key actions being taken in the light of the survey results to address areas of concern or secure improvement.

Annex E

Proposed template for publishing summaries of periodic programme/department reviews

1. Programme(s), subject area, or department covered by the review.

2. Date of review.

3. Objectives of review.

4. Conduct of review.

   A brief statement of how the review was conducted, who was involved, and what review methods they used.

5. Evidence base.

   A brief statement of the evidence which was drawn on; and specifically, what use was made of:

   - external examiners' reports
   - reports (if any) from accrediting or other bodies
   - staff and student feedback
   - feedback from former students and their employers.

6. External peer contributors to process.

   A brief statement on how external peers were involved, how they were selected, and what their role was.

7. Overview of main characteristics of the programmes covered by the review.

   A brief statement of the review team's overview of the programmes in relation to content and approach, and notable strengths.

8. Conclusions on innovation and good practice.

   Identification of current aspects of the programmes which are particularly innovative or which represent good practice.

9. Conclusions on quality and standards.

   A brief statement of the review team's conclusions on whether intended learning outcomes are being attained by students, quality and standards are being achieved, and the programme specification is being delivered.

10. Conclusions on whether the programme(s) remain current and valid in the light of developing knowledge in the discipline, practice in its application and developments in teaching and learning.

11. Forward looking recommendations for actions to remedy any identified shortcomings, and for further enhancement of quality and standards.

    These recommendations might adopt the institutional audit concept of distinguishing between aspects for commendation and aspects for improvement, with an indication of significance and urgency in the latter.

List of abbreviations

HE	Higher education
HEI	Higher education institution
HEFCE	Higher Education Funding Council for England
SCOP	Standing Conference of Principals
UUK	Universities UK
QAA	Quality Assurance Agency for Higher Education
HESA	Higher Education Statistics Agency
JACS	Joint Academic Coding System
UCAS	Universities and Colleges Admissions Service
FDS	First Destination Survey
HERO	Higher Education and Research Opportunities (web portal)
HEMS	Higher Education Management Statistics
NUS	National Union of Students
NPC	National Postgraduate Committee
PSRBs	Professional, statutory and regulatory bodies
FEC	Further education college
AUT	Association of University Teachers
CIHE	Council for Industry and Higher Education
NATFHE	National Association of Teachers in Further and Higher Education

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